

# ATTACHMENT A

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MAR 12 2001

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

The Use of N11 Codes and Other Abbreviated  
Dialing Arrangements

CC Docket No. 92-105 /

**SBC COMMUNICATIONS INC.'S REQUEST FOR CLARIFICATION**

SBC Communications Inc., on its own behalf and on behalf of its local exchange carriers,<sup>1</sup> (SBC) requests clarification of certain matters set out in the Commission's *Third Report and Order and Order on Reconsideration*.<sup>2</sup>

**A. Request for clarification on additional fees to end-users.**

In its Order, the Commission noted that "[b]oth petitioners propose to provide access to their services without an additional charge to callers . . . ."<sup>3</sup> SBC presumes that the Commission meant that the entities providing the travel information and the community service information and referral services would not charge for providing those services. Nevertheless, the language of the Order might be ambiguous to some and, therefore, SBC seeks clarification of the Commission's expectations.

By referring to "access . . . without additional charge to callers," does the Commission mean that a call originator will not incur any local or toll charges when placing a 211 or 511 call? If so, would this include calls originating from payphones? Or does the Commission mean

<sup>1</sup> These local exchange carriers include the Ameritech operating companies (Illinois Bell Telephone Company, Indiana Bell Telephone Company, Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell Telephone Company), Nevada Bell Telephone Company, Pacific Bell Telephone Company, Southern New England Telephone, Southwestern Bell Telephone Company, and SBC Telecom.

<sup>2</sup> *In the Matter of The Use of N11 Codes and Other Abbreviated Dialing Arrangements*, CC Docket 92-105, *Third Report and Order and Order on Reconsideration*, FCC 00-256 (rel. July 31, 2000) (*Third Report & Order*).

<sup>3</sup> *Third Report & Order*, ¶ 2.

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that 211 or 511 call originators will incur no additional charge above and beyond normal local or toll charges? Given the national intent of these two services, this decision should be decided uniformly across the nation.

**B. Request for clarification of the Commission's role in 211/511 issues.**

The Commission has assigned the 511 and 211 dialing codes for travel information and community services information, respectively.<sup>4</sup> Yet, in doing so, the Commission has provided little guidance as to the implementation of these services. Other than noting that "State public utilities commissions may continue to exercise jurisdiction over N11 codes to the extent necessary to ensure that carriers comply with transportation agencies' requests to deploy 511 expeditiously,"<sup>5</sup> the Commission provides no direction on how disputes and other issues might be addressed and resolved, especially when the various parties reach an impasse.

SBC requests clarification of the role, if any, the Commission intends to play in selecting the appropriate agencies to receive 211 and 511 calls for a particular geographic area. Likewise, what role will the Commission play in resolving any disputes associated with multiple agencies requesting to receive 211 or 511 for the same geographic area? If the Commission does not intend to take an active role in selecting agencies or resolving any disputes, does the Commission intend to rely on state public utility commissions to fill this role? Some state public utility commissions have already expressed an interest in selecting the appropriate agencies for receipt of 211 or 511 calls within a given geographic area. The Commission's clarification of its vision as to how this process is intended to unfold would be helpful.

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<sup>4</sup> *Third Report & Order*, ¶¶ 15 and 21.

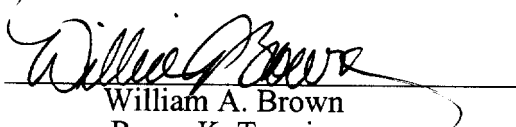
<sup>5</sup> *Third Report & Order*, ¶ 15.

Respectfully submitted,

SBC COMMUNICATIONS INC.

March 12, 2001

By:

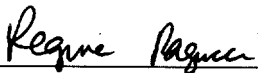
  
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### **CERTIFICATE OF SERVICE**

I, Regina Ragucci, do hereby certify that on this 12<sup>th</sup> day of March 2001, Comments of SBC Communications Inc. in CC Docket No. 92-105, was served via hand delivery and first-class, postage pre-paid to the parties listed below.

  
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